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11 *Attorneys for Defendant*
12 *Bunga Bunga LLC*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LUIS PONCE, an individual, and ON
16 BEHALF OF OTHERS SIMILARLY
17 SITUATED,

Case No. 2:19-cv-02002-KJD-VCF

18 Plaintiffs,

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFFS'
COMPLAINT**

19 vs.
20 BUNGA BUNGA LLC, a domestic limited-
21 liability company,

(THIRD REQUEST)

22 Defendant.

23 IT IS HEREBY STIPULATED by and between Plaintiff Luis Ponce ("Plaintiff"), through
24 his counsel Lagomarsino Law, and Defendant Bunga Bunga LLC ("Defendant"), through its
25 counsel Jackson Lewis P.C., that Defendant shall have up to and including Friday, March 13,
26 2020, in which to file a response to Plaintiff's Complaint. This Stipulation is submitted and based
27 upon the following:

28 1. Defendant's response to the Complaint is currently due on February 13, 2020.
29 2. In the interest of avoiding litigation and unnecessary expenditure of resources, the
30 parties have elected to evaluate the potential for settlement of the claims alleged in the Complaint.
31 Plaintiff conveyed a settlement offer on an individual basis to Defendant on February 3, 2020.
32 Defendant is in the process of evaluating the offer, including assessment of the potential for

1 settlement that would apply to all members of Plaintiff's proposed collective and class. The
2 parties require further time to evaluate potential settlement.

3 3. This is the third request for an extension of time for Defendant to file a response to
4 Plaintiff's Complaint.

5 4. This request is made in good faith and not for the purpose of delay.

6 5. Nothing in this Stipulation, nor the fact of entering into the same, shall be
7 construed as waiving any claim and/or defense held by any party.

8 Dated this 10th day of February, 2020.

9 LAGOMARSINO LAW

10 *s/ Andre M. Lagomarsino*

11 Andre M. Lagomarsino, Bar No. 6711
12 3005 W. Horizon Ridge Pkwy., Suite 241
13 Henderson, Nevada 89052

14 *Attorney for Plaintiff*

9 JACKSON LEWIS P.C.

10 *s/ Daniel I. Aquino*

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13 300 S. Fourth Street, Ste. 900
14 Las Vegas, Nevada 89101

15 *Attorneys for Defendant*

16 **ORDER**

17 IT IS SO ORDERED:

18 

19 _____
20 United States Magistrate Judge

21 Dated: 2-11-2020